

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----	X	
	:	
TZVI WEISS, <i>et. al.</i> ,	:	
	:	
Plaintiffs,	:	CV 05-4622 (CPS) (KAM)
	:	
-against-	:	
	:	
	:	ANSWER AND
	:	<u>AFFIRMATIVE DEFENSES</u>
NATIONAL WESTMINSTER BANK, PLC,	:	
	:	
Defendant.	:	
	:	
-----	X	

Defendant National Westminster Bank, PLC (“NatWest”) by its counsel, Cleary
Gottlieb Steen & Hamilton LLP, as and for its Answer and Affirmative Defenses to the Third
Amended Complaint (the “Complaint”), states as follows:

NATURE OF ACTION

1. Denies the allegations contained in paragraph 1 of the Complaint and the
footnote thereto to the extent they involve matters of fact relating to NatWest, denies knowledge
or information sufficient to form a belief as to the truth of such allegations as they pertain to
other persons and states that the balance of paragraph 1 consists of conclusions of law to which
no responsive pleading is necessary, except admits that NatWest is a financial institution
headquartered in the United Kingdom.

JURISDICTION AND VENUE

2. Denies knowledge or information sufficient to form a belief as to the truth
of the allegations contained in paragraph 2 of the Complaint, except admits that plaintiffs purport
to base jurisdiction on the statutory provisions cited therein.

3. States that paragraph 3 of the Complaint consists of a legal conclusion as to which no responsive pleading is necessary.

4. Denies the allegations contained in paragraph 4 of the Complaint.

THE PARTIES

5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Complaint.

6. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the Complaint.

7. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Complaint to the extent they refer to matters of fact, and states that the balance of paragraph 7 consists of conclusions of law to which no responsive pleading is necessary.

8. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Complaint.

9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the Complaint.

10. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint.

11. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of the Complaint.

12. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the Complaint.

13. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of the Complaint and the footnote thereto.

14. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14 of the Complaint.

15. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 of the Complaint.

16. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 16 of the Complaint.

17. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 17 of the Complaint.

18. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 18 of the Complaint.

19. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 19 of the Complaint.

20. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 20 of the Complaint.

21. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 21 of the Complaint.

22. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 22 of the Complaint.

23. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 23 of the Complaint.

24. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 24 of the Complaint and the footnote thereto.

25. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of the Complaint.

26. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of the Complaint.

27. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of the Complaint.

28. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 28 of the Complaint.

29. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 29 of the Complaint.

30. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 30 of the Complaint.

31. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 31 of the Complaint.

32. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 32 of the Complaint.

33. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 33 of the Complaint.

34. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34 of the Complaint.

35. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 35 of the Complaint.

36. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of the Complaint.

37. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 37 of the Complaint.

38. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 of the Complaint.

39. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of the Complaint.

40. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of the Complaint.

41. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of the Complaint.

42. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 42 of the Complaint.

43. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of the Complaint.

44. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of the Complaint.

45. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of the Complaint.

46. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of the Complaint.

47. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 47 of the Complaint.

48. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of the Complaint.

49. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 49 of the Complaint.

50. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of the Complaint.

51. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of the Complaint.

52. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of the Complaint.

53. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of the Complaint.

54. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 54 of the Complaint.

55. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 55 of the Complaint.

56. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of the Complaint.

57. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of the Complaint.

58. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of the Complaint.

59. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 59 of the Complaint.

60. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of the Complaint.

61. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of the Complaint.

62. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 62 of the Complaint.

63. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 63 of the Complaint.

64. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 64 of the Complaint.

65. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 65 of the Complaint.

66. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 66 of the Complaint.

67. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 67 of the Complaint.

68. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 68 of the Complaint.

69. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of the Complaint.

70. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of the Complaint.

71. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 71 of the Complaint.

72. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of the Complaint.

73. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of the Complaint.

74. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 74 of the Complaint.

75. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of the Complaint.

76. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of the Complaint.

77. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 77 of the Complaint.

78. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 78 of the Complaint.

79. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 79 of the Complaint.

80. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of the Complaint.

81. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 81 of the Complaint.

82. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of the Complaint.

83. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 83 of the Complaint.

84. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 84 of the Complaint.

85. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 85 of the Complaint.

86. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 86 of the Complaint.

87. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 87 of the Complaint.

88. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 88 of the Complaint.

89. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 89 of the Complaint.

90. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 90 of the Complaint.

91. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 91 of the Complaint.

92. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 92 of the Complaint.

93. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 93 of the Complaint.

94. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 94 of the Complaint.

95. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 95 of the Complaint.

96. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 96 of the Complaint.

97. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 97 of the Complaint.

98. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 98 of the Complaint.

99. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 99 of the Complaint.

100. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 100 of the Complaint.

101. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 101 of the Complaint.

102. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 102 of the Complaint.

103. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 103 of the Complaint.

104. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 104 of the Complaint.

105. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 105 of the Complaint.

106. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 106 of the Complaint.

107. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 107 of the Complaint.

108. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 108 of the Complaint.

109. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 109 of the Complaint.

110. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 110 of the Complaint.

111. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 111 of the Complaint.

112. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 112 of the Complaint.

113. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 113 of the Complaint.

114. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 114 of the Complaint.

115. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 115 of the Complaint.

116. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 116 of the Complaint.

117. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 117 of the Complaint.

118. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 118 of the Complaint.

119. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 119 of the Complaint.

120. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 120 of the Complaint.

121. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 121 of the Complaint.

122. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 122 of the Complaint.

123. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 123 of the Complaint.

124. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 124 of the Complaint.

125. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 125 of the Complaint.

126. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 126 of the Complaint.

127. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 127 of the Complaint.

128. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 128 of the Complaint.

129. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 129 of the Complaint.

130. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 130 of the Complaint.

131. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 131 of the Complaint.

132. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 132 of the Complaint.

133. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 133 of the Complaint.

134. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 134 of the Complaint.

135. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 135 of the Complaint.

136. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 136 of the Complaint.

137. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 137 of the Complaint.

138. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 138 of the Complaint.

139. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 139 of the Complaint.

140. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 140 of the Complaint.

141. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 141 of the Complaint.

142. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 142 of the Complaint.

143. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 143 of the Complaint.

144. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 144 of the Complaint.

145. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 145 of the Complaint.

146. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 146 of the Complaint.

147. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 147 of the Complaint.

148. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 148 of the Complaint.

149. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 149 of the Complaint.

150. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 150 of the Complaint.

151. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 151 of the Complaint.

152. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 152 of the Complaint.

153. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 153 of the Complaint.

154. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 154 of the Complaint.

155. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 155 of the Complaint.

156. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 156 of the Complaint.

157. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 157 of the Complaint.

158. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 158 of the Complaint.

159. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 159 of the Complaint.

160. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 160 of the Complaint.

161. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 161 of the Complaint.

162. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 162 of the Complaint.

163. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 163 of the Complaint.

164. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 164 of the Complaint.

165. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 165 of the Complaint.

166. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 166 of the Complaint.

167. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 167 of the Complaint.

168. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 168 of the Complaint.

169. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 169 of the Complaint.

170. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 170 of the Complaint.

171. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 171 of the Complaint.

172. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 172 of the Complaint.

173. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 173 of the Complaint.

174. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 174 of the Complaint.

175. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 175 of the Complaint.

176. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 176 of the Complaint.

177. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 177 of the Complaint.

178. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 178 of the Complaint.

179. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 179 of the Complaint.

180. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 180 of the Complaint.

181. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 181 of the Complaint.

182. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 182 of the Complaint.

183. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 183 of the Complaint.

184. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 184 of the Complaint.

185. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 185 of the Complaint.

186. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 186 of the Complaint.

187. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 187 of the Complaint.

188. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 188 of the Complaint.

189. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 189 of the Complaint.

190. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 190 of the Complaint.

191. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 191 of the Complaint.

192. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 192 of the Complaint.

193. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 193 of the Complaint.

194. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 194 of the Complaint.

195. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 195 of the Complaint.

196. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 196 of the Complaint.

197. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 197 of the Complaint.

198. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 198 of the Complaint.

199. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 199 of the Complaint.

200. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 200 of the Complaint.

201. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 201 of the Complaint.

202. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 202 of the Complaint.

203. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 203 of the Complaint.

204. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 204 of the Complaint.

205. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 205 of the Complaint.

206. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 206 of the Complaint.

207. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 207 of the Complaint.

208. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 208 of the Complaint.

209. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 209 of the Complaint.

210. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 210 of the Complaint.

211. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 211 of the Complaint.

212. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 212 of the Complaint.

213. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 213 of the Complaint.

214. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 214 of the Complaint.

215. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 215 of the Complaint.

216. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 216 of the Complaint.

217. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 217 of the Complaint.

218. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 218 of the Complaint.

219. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 219 of the Complaint.

220. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 220 of the Complaint.

221. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 221 of the Complaint.

222. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 222 of the Complaint and the footnote thereto.

223. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 223 of the Complaint.

224. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 224 of the Complaint.

225. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 225 of the Complaint.

226. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 226 of the Complaint.

227. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 227 of the Complaint.

228. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 228 of the Complaint.

229. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 229 of the Complaint.

230. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 230 of the Complaint.

231. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 231 of the Complaint.

232. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 232 of the Complaint.

233. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 233 of the Complaint.

234. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 234 of the Complaint.

235. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 235 of the Complaint.

236. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 236 of the Complaint.

237. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 237 of the Complaint.

238. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 238 of the Complaint.

239. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 239 of the Complaint.

240. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 240 of the Complaint.

241. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 241 of the Complaint.

242. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 242 of the Complaint.

243. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 243 of the Complaint.

244. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 244 of the Complaint.

245. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 245 of the Complaint.

246. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 246 of the Complaint.

247. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 247 of the Complaint.

248. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 248 of the Complaint.

249. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 249 of the Complaint.

250. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 250 of the Complaint.

251. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 251 of the Complaint.

252. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 252 of the Complaint.

253. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 253 of the Complaint.

254. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 254 of the Complaint.

255. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 255 of the Complaint.

256. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 256 of the Complaint.

257. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 257 of the Complaint.

258. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 258 of the Complaint.

259. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 259 of the Complaint.

260. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 260 of the Complaint.

261. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 261 of the Complaint.

262. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 262 of the Complaint.

263. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 263 of the Complaint.

264. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 264 of the Complaint.

265. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 265 of the Complaint.

266. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 266 of the Complaint.

267. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 267 of the Complaint.

268. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 268 of the Complaint.

269. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 269 of the Complaint.

270. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 270 of the Complaint.

271. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 271 of the Complaint.

272. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 272 of the Complaint.

273. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 273 of the Complaint.

274. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 274 of the Complaint.

275. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 275 of the Complaint.

276. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 276 of the Complaint.

277. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 277 of the Complaint.

278. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 278 of the Complaint.

279. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 279 of the Complaint.

280. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 280 of the Complaint.

281. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 281 of the Complaint.

282. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 282 of the Complaint.

283. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 283 of the Complaint.

284. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 284 of the Complaint.

285. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 285 of the Complaint.

286. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 286 of the Complaint.

287. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 287 of the Complaint.

288. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 288 of the Complaint.

289. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 289 of the Complaint.

290. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 290 of the Complaint.

291. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 291 of the Complaint.

292. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 291 of the Complaint.

293. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 293 of the Complaint.

294. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 294 of the Complaint.

295. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 295 of the Complaint.

296. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 296 of the Complaint.

297. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 297 of the Complaint.

298. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 298 of the Complaint.

299. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 299 of the Complaint.

300. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 300 of the Complaint.

301. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 301 of the Complaint.

302. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 302 of the Complaint.

303. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 303 of the Complaint.

304. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 304 of the Complaint.

305. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 305 of the Complaint.

306. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 306 of the Complaint.

307. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 307 of the Complaint.

308. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 308 of the Complaint.

309. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 309 of the Complaint.

310. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 310 of the Complaint.

311. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 311 of the Complaint.

312. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 312 of the Complaint.

313. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 313 of the Complaint.

314. Denies the allegations contained in paragraph 314 of the Complaint, except admits that NatWest is a British financial institution with its principal place of business in London, United Kingdom, and avers that NatWest is a wholly-owned subsidiary of the Royal Bank of Scotland Group.

315. Denies the allegations contained in paragraph 315 of the Complaint.

316. Denies the allegations contained in paragraph 316 of the Complaint, except admits that NatWest was registered to conduct business within the State of Texas, avers that NatWest closed its Texas office on September 15, 2003, and refers the Court to the Texas state records for a true and accurate statement of their contents.

FACTUAL ALLEGATIONS

317. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 317 of the Complaint.

318. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 318 of the Complaint.

319. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 319 of the Complaint.

320. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 320 of the Complaint.

321. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 321 of the Complaint.

322. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 322 of the Complaint.

323. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 323 of the Complaint.

324. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 324 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 324 consists of conclusions of law to which no responsive pleading is necessary.

325. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 325 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 325 consists of conclusions of law to which no responsive pleading is necessary.

326. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 326 of the Complaint.

327. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 327 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 327 consists of conclusions of law to which no responsive pleading is necessary.

328. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 328 of the Complaint, to the extent they refer to matters

of fact, and states that the balance of paragraph 328 consists of conclusions of law to which no responsive pleading is necessary.

329. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 329 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 329 consists of conclusions of law to which no responsive pleading is necessary.

330. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 330 of the Complaint.

331. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 331 of the Complaint.

332. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 332 of the Complaint and the footnote thereto.

333. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 333 of the Complaint.

334. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 334 of the Complaint.

335. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 335 of the Complaint.

336. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 336 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 336 consists of conclusions of law to which no responsive pleading is necessary.

337. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 337 of the Complaint, except denies that Interpal maintains several accounts at NatWest.

338. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 338 of the Complaint.

339. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 339 of the Complaint.

340. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 340 of the Complaint.

341. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 341 of the Complaint, except admits, upon information and belief, that the U.S. government designated Interpal a Specially Designated Global Terrorist (“SDGT”) on or around August 22, 2003.

342. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 342 of the Complaint, except admits, upon information and belief, that the U.S. government designated Interpal an SDGT on or around August 22, 2003.

343. Denies the allegations contained in paragraph 343 of the Complaint.

344. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 344 of the Complaint.

345. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 345 of the Complaint.

346. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 346 of the Complaint and the footnote thereto.

347. Denies the allegations contained in paragraph 347 of the Complaint concerning knowledge by NatWest of Yussuf al-Qaradawi's connections to terrorism and Interpal, and denies having knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

348. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 348 of the Complaint.

349. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 349 of the Complaint.

350. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 350 of the Complaint and the footnote thereto.

351. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 351 of the Complaint.

352. Denies the allegations contained paragraph 352 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 352.

353. Denies the allegations contained in paragraph 353 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 353.

354. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 354 of the Complaint.

355. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 355 of the Complaint and the footnote thereto.

356. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 356 of the Complaint.

357. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 357 of the Complaint.

358. Denies the allegations contained in paragraph 358 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 358.

359. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 359 of the Complaint.

360. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 360 of the Complaint.

361. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 361 of the Complaint.

362. Denies the allegations contained in paragraph 362 of the Complaint.

363. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 363 of the Complaint.

364. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 364 of the Complaint.

365. Admits the allegations contained in paragraph 365 of the Complaint.

366. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 366 of the Complaint, except admits that Interpal had accounts at NatWest in 1996, avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April

1996, and refers to the Charities Act 1993 for a true and accurate description of the Commission's powers and functions.

367. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 367 of the Complaint and the footnote thereto.

368. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 368 of the Complaint and the footnote thereto, except admits that Interpal had accounts at NatWest in 1996, and avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April 1996.

369. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 369 of the Complaint, except admits that Interpal had accounts at NatWest in 1996, avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April 1996, and refers to the Charity Commission's May 30, 1996 report for a true and accurate statement of the Commission's findings.

370. In response to paragraph 370 of the Complaint, refers to the Charity Commission's May 30, 1996 report for a true and accurate statement of its contents.

371. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 371 of the Complaint, and refers to the Charity Commission's May 30, 1996 report for a true and accurate statement of its contents.

372. States that paragraph 372 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

373. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 373 of the Complaint to the extent they involve matters of fact, and states that the balance of paragraph 373 consists of conclusions of law to which no responsive pleading is necessary.

374. Denies the allegations contained in paragraph 374 of the Complaint to the extent they involve matters of fact that pertain to NatWest, denies knowledge or information sufficient to form a belief as to such allegations as they pertain to any other person, and states that to the extent paragraph 374 involves conclusions of law, no responsive pleading is necessary.

375. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 375 of the Complaint, except admits that Interpal had accounts at NatWest, and avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April 1996.

376. Denies the allegations contained in paragraph 376 of the Complaint.

377. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 377 of the Complaint.

378. Denies the allegations contained in paragraph 378 of the Complaint.

379. Denies the allegations contained in paragraph 379 of the Complaint and the footnote thereto to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of such allegations as they pertain to any other person.

380. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 380 of the Complaint and the footnote thereto.

381. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 381 of the Complaint.

382. Denies the allegations contained in paragraph 382 of the Complaint, except admits that on August 16, 2002, and pursuant to instructions received from Interpal, NatWest effected the transfer of \$1,875.65 from an account owned by Interpal to the Orphan Care Society.

383. Denies the allegations contained in paragraph 383 of the Complaint, except admits that on September 17, 2002, and pursuant to instructions received from Interpal, NatWest effected the transfer of £6,533.00 from an account owned by Interpal to the Orphan Care Society.

384. Denies the allegations contained in paragraph 384 of the Complaint, except admits that on November 15, 2002, and pursuant to instructions received from Interpal, NatWest effected the transfer of £5,693.00 from an account owned by Interpal to the Orphan Care Society.

385. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 385 of the Complaint.

386. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 386 of the Complaint.

387. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 387 of the Complaint.

388. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 388 of the Complaint.

389. Denies the allegations contained in paragraph 389 of the Complaint, except admits that on May 2, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £15,687.00 from an account owned by Interpal to the Jenin Zakat Committee.

390. Denies the allegations contained in paragraph 390 of the Complaint, except admits that on July 11, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £15,330.00 from an account owned by Interpal to the Jenin Zakat Committee.

391. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 391 of the Complaint.

392. States that paragraph 392 of the Complaint purports to reference organizations listed in paragraph 352 of the Complaint, but as no list of organizations appears in paragraph 352, no responsive pleading is necessary.

393. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 393 of the Complaint, except avers that NatWest has not accepted funds transfers from entities that it knows to have “terrorist connections.”

394. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 394 of the Complaint.

395. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 395 of the Complaint.

396. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 396 of the Complaint to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

397. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 397 of the Complaint to the extent they involve matters

of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

398. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 398 of the Complaint to the extent they involve matters of fact, except admits, upon information and belief, that the Council of the European Union designated the Holy Land Foundation as a terrorist organization in December 2001, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

399. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 399 of the Complaint to the extent they involve matters of fact, except admits, upon information and belief, that HAMAS and the Holy Land Foundation were named on the European Union's list of entities subject to financial sanctions, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

400. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 400 of the Complaint.

401. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 401 of the Complaint and the footnote thereto to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

402. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 402 of the Complaint to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

403. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 403 of the Complaint.

404. Denies the allegations contained in paragraph 404 of the Complaint, except admits that on March 27, 2003, and pursuant to instructions received from Interpal, NatWest accepted payments totaling 295,000 Euros from Stichting Al-Aqsa, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the footnote thereto.

405. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 405 of the Complaint to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

406. Denies the allegations contained in paragraph 406 of the Complaint.

407. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 407 of the Complaint.

408. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 408 of the Complaint.

409. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 409 of the Complaint.

410. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 410 of the Complaint.

411. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 411 of the Complaint.

412. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 412 of the Complaint.

413. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 413 of the Complaint to the extent they refer to matters of fact, except admits, upon information and belief, that the U.S. government designated Interpal an SDGT on or around August 22, 2003, and states that the balance of paragraph 413 consists of conclusions of law to which no responsive pleading is necessary.

414. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 414 of the Complaint.

415. Denies the allegations contained in paragraph 415 of the Complaint.

416. Denies the allegations contained in paragraph 416 of the Complaint as they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

417. Denies the allegations contained in paragraph 417 of the Complaint.

418. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 418 of the Complaint.

419. Denies the allegations contained in paragraph 419 of the Complaint.

420. Denies the allegations contained in paragraph 420 of the Complaint and avers that at various times, Interpal had accounts numbered 140-00-04156838, 60720508524882 and 60082295142940 at NatWest.

421. Denies the allegations contained in paragraph 421 of the Complaint.

422. Denies the allegations contained in paragraph 422 of the Complaint.

423. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 423 of the Complaint.

424. Denies the allegations contained in paragraph 424 of the Complaint.

425. Denies the allegations contained in paragraph 425 of the Complaint.

426. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 426 of the Complaint.

427. Denies the allegations contained in paragraph 427 of the Complaint relating to the transfer by Interpal, except admits that on February 19, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £21,424.00 from an account owned by Interpal to the Tulkarem Zakat Committee, and denies knowledge or information sufficient to form a belief as to the truth of the balance of allegations contained in paragraph 427 of the Complaint, including the authenticity of Exhibit A.

428. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 428 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 428 consists of conclusions of law to which no responsive pleading is necessary.

429. Denies the allegations contained in paragraph 429 of the Complaint, except admits that on April 1, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £17,974.00 from an account owned by Interpal to the Tulkarem Zakat Committee.

430. Denies the allegations contained in paragraph 430 of the Complaint relating to the transfer by Interpal, except admits that on July 30, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £73,757.00 from Interpal's

account numbered Interpal 60082295142940 to the Jenin Charitable Society, and denies knowledge or information sufficient to form a belief as to the truth of the balance of allegations contained in paragraph 430 of the Complaint and the footnote thereto, including the authenticity of Exhibit B.

431. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 431 of the Complaint.

432. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 432 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 432 consists of conclusions of law to which no responsive pleading is necessary.

433. Denies the allegations contained in paragraph 433 of the Complaint.

434. Denies the allegations contained in paragraph 434 of the Complaint relating to the transfer by Interpal, except admits that on November 5, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £32,329.00 from Interpal's account numbered 60082295142940 to the Jenin Charitable Society, and denies knowledge or information sufficient to form a belief as to the truth of the balance of allegations contained in paragraph 434 of the Complaint, including the authenticity of Exhibit C.

435. States that paragraph 435 of the Complaint, which is a sentence fragment, consists of conclusions of law to which no responsive pleading is necessary.

436. States that paragraph 436 of the Complaint, which is a sentence fragment, consists of conclusions of law to which no responsive pleading is necessary.

437. Denies that the Financial Action Task Force defines and enforces legal norms, and states that the balance of paragraph 437 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

438. Upon information and belief, admits the allegations contained in paragraph 438 of the Complaint.

439. States that paragraph 439 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

440. States that paragraph 440 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

441. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 441 of the Complaint.

442. States that paragraph 442 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

443. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 443 of the Complaint, except, upon information and belief, admits that the FATF issued a report in April 2002, and refers to that report for a true and accurate statement of its contents.

444. To the extent that paragraph 444 of the Complaint quotes from the FATF report, refers to such report for a true and accurate statement of its contents, and states that paragraph 444 otherwise consists of conclusions of law to which no responsive pleading is necessary.

445. States that paragraph 445 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

446. Denies the allegations contained in paragraph 446 of the Complaint.

447. Denies the allegations contained in paragraph 447 of the Complaint, and refers to the July 16, 2002 press release by six U.K. banks, including Royal Bank of Scotland, for a true and accurate statement of its contents.

448. Denies the allegations contained in paragraph 448, avers that six U.K. banks, including Royal Bank of Scotland, issued a "Statement of Principles" on July 16, 2002, and refers to such Statement for a true and accurate statement of its contents.

449. Denies the allegations contained in paragraph 449 to the extent they purport to involve matters of fact, and states that to the extent paragraph 449 of the Complaint consists of conclusions of law, no responsive pleading is necessary.

450. States that paragraph 450 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

451. States that paragraph 451 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

452. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 452 of the Complaint.

453. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 453 of the Complaint.

FIRST CLAIM FOR RELIEF

454.-461. In response to paragraphs 454-461 of the Complaint, states that this claim has been dismissed by previous order of the Court, and that no responsive pleading to them is therefore required.

SECOND CLAIM FOR RELIEF

462. In response to paragraph 462 of the Complaint, reports and realleges through 461 hereof as if fully set forth herein.

463. Denies the allegations contained in paragraph 463 of the Complaint.

464. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 464 of the Complaint.

465. Denies the allegations contained in paragraph 465 of the Complaint.

466. Denies the allegations contained in paragraph 466 of the Complaint.

467. Denies the allegations contained in paragraph 467 of the Complaint.

468. Denies the allegations contained in paragraph 468 of the Complaint.

THIRD CLAIM FOR RELIEF

469. In response to paragraph 469 of the Complaint, reports and realleges through 468 hereof as if fully set forth herein.

470. Denies the allegations contained in paragraph 470 of the Complaint.

471. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 471 of the Complaint.

472. Denies the allegations contained in paragraph 472 of the Complaint.

AFFIRMATIVE DEFENSES

First Affirmative Defense

473. The Complaint fails to state a claim upon which relief can be granted.

Second Affirmative Defense

474. Plaintiffs' claims are barred, in whole or in part, by the intervening acts, wrongs, omissions and/or negligence of other individuals or entities.

Third Affirmative Defense

475. To the extent that plaintiffs have suffered damages, any such damages were not caused by any conduct of NatWest, but resulted in whole or in part from the conduct of plaintiffs and/or persons other than NatWest.

Fourth Affirmative Defense

476. There is no legal basis for Plaintiffs' requested relief of punitive damages, attorney's fees, and declaratory order.

Fifth Affirmative Defense

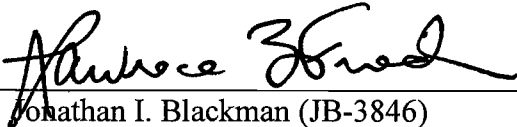
477. To the extent that plaintiffs have already recovered or will from other persons for the injuries alleged by them, they are barred from seeking duplicative recovery from NatWest.

Additional Affirmative Defenses

478. NatWest hereby gives notice that it intends to rely upon any other defense or defenses that may become available or appear during pretrial proceedings in this case and hereby reserves the right to amend this Answer and Affirmative Defenses to the Third Amended Complaint to plead and assert any such additional affirmative defenses as they become known and appropriate during the course of litigation.

Dated: New York, New York
May 18, 2007

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: 
Jonathan I. Blackman (JB-3846)
Lawrence B. Friedman (LF-9978)

One Liberty Plaza
New York, New York 10006
(212) 225-2000

Attorneys for Defendant
National Westminster Bank Plc

Of Counsel:

Kirsten L. O'Connell
Patrick A. Sheldon